

UNITED STATES DISTRICT COURT

for the
Southern District of OhioIn the Matter of the Tracking of
(Identify the person to be tracked or describe
the object or property to be used for tracking)2012 silver Ford Taurus bearing Ohio license
JNV5161, registered to Elyzabeth Renee Johnson,
2448 Attowa Dr Columbus, OH 43229, and located at
3353 Urban Hollow Ct Urbancrest, OH 43123.

Case No. 2:22-mj-58

APPLICATION FOR A TRACKING WARRANT

I, a federal law enforcement officer or attorney for the government, have reason to believe that the person, property, or object described above has been and likely will continue to be involved in one or more violations of 18 U.S.C. § 2114. Therefore, in furtherance of a criminal investigation, I request authority to install and use a tracking device or use the tracking capabilities of the property or object described above to determine location. The application is based on the facts set forth on the attached sheet.

- ☒ The person, property, or object is located in this district.
☐ The activity in this district relates to domestic or international terrorism.
☐ The person, property, or object is not now located in this district, but will be at the time of execution.
☐ Other:

The tracking will likely reveal these bases for the warrant under Fed. R. Crim. P. 41(c): (check one or more)

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

☒ I further request, for purposes of installing, maintaining or removing the tracking device, authority to enter the following vehicle or private property, or both:
2012 silver Ford Taurus bearing Ohio license JNV5161, registered to Elyzabeth Renee Johnson, 2448 Attowa Dr Columbus, OH 43229, and located at 3353 Urban Hollow Ct Urbancrest, OH 43123.

☒ Delayed notice of 30 days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Mark V. Massaro, United States Postal Inspector

Applicant's printed name and title

Sworn to before me and signed in my presence.

Date: January 28, 2022

City and state: Columbus, Ohio

Kimberly A. Johnson
United States Magistrate Judge

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A TRACKING WARRANT

I, Mark V. Massaro, being duly sworn, state as follows:

Introduction and Agent Background

1. I am a U.S. Postal Inspector with the U.S. Postal Inspection Service in Columbus, Ohio, and have been so employed since August 2013. I am a sworn federal law enforcement officer empowered to investigate criminal activity involving or relating to the United States Postal Service (“USPS”) and/or U.S. Mail. The crimes investigated include those such as theft, burglary, counterfeiting, robbery, assault, homicide, dangerous mailings, narcotics, identity theft, and fraud. I received initial training for these types of investigations through the U. S. Postal Inspection Service, Basic Inspector Training. I have received additional on the job training for each of my assigned investigative functions.
2. I make this affidavit in support of an application for a search warrant pursuant Federal Rule of Criminal Procedure 41(b)(4) and 18 U.S.C. § 3117 authorizing the installation, use, monitoring, collection of data, and maintenance of a mobile global position system (“GPS”) tracking device on a 2012 silver Ford Taurus bearing Ohio license JNV5161, registered to Elyzabeth Renee Johnson, 2448 Attowa Drive, Columbus, Ohio (hereinafter collectively the “**SUBJECT VEHICLE**”).
3. In the event the Court grants this application, law enforcement officials will periodically monitor the movement and location of the **SUBJECT VEHICLE** during both daytime and nighttime hours for a period of no more than 45 days from the date the warrant is issued. The **SUBJECT VEHICLE** may generate GPS location information from inside private areas, such as a residence or other location not open to the public or visual surveillance.
4. This affidavit is intended to establish the existence of sufficient probable cause for the issuance of the requested warrant. It does not purport to set forth all the facts and circumstances presently known by your Affiant or the subject investigation. The facts set forth in this affidavit are based on my personal observations and knowledge of the investigation, knowledge I have obtained from other law enforcement officials familiar and knowledgeable of facts and circumstances involved with the subject investigation, my knowledge of facts obtained from interviews of various witnesses connected to the subject investigation, a review of records generated by and related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and other information and insights I have gained through my prior training and experience.
5. Based on the facts set forth in this affidavit, there is probable cause to believe that a violation of 18 U.S.C. § 2114(a) (assault and/or robbery of mail matter, money, or other property of the United States) and 18 U.S.C. § 1704 (postal keys or locks stolen or reproduced) (hereafter “the Subject Offenses”) have been committed, are currently being committed, and will continue to be committed by certain individual(s) utilizing the **SUBJECT VEHICLE**, who are located both within and outside the Southern District of Ohio.

6. Specifically, there is probable cause to believe that the **SUBJECT VEHICLE** will provide or lead to the discovery of relevant evidence, contraband, fruits, and instrumentalities of the subject offenses, including but not limited to information regarding locations where the **SUBJECT VEHICLE** is driven to that could assist in identifying co-conspirators and addresses and locations associated with the commission of said crimes.

Information about the Subject Device

7. Law enforcement investigators request authorization to place a GPS tracking device on the exterior of the **SUBJECT VEHICLE**. This will enable investigators to monitor the movement and physical location of the **SUBJECT VEHICLE** wherever known and unknown co-conspirator(s) may take it in furtherance of suspected postal crimes, occurring both within and outside the Southern District of Ohio.

Background of the Investigation

8. On or about December 2, 2021, at approximately 2:45PM, a USPS Letter Carrier was delivering mail on foot near 5152 Holbrook, Columbus, Ohio. The carrier stated that a silver/gray four-door sedan with an undersized spare tire on the front passenger side approached him. Someone yelled out the passenger side window “don’t move.” An unknown male black suspect then approached the postal employee holding a rifle and demanded his postal keys before fleeing in the **SUBJECT VEHICLE**. The carrier gave the unknown male his USPS Arrow Key, which belonged to the USPS, and which is used to access USPS mailboxes and receptacles.
9. The United States Postal Inspection Service (“USPIS”) and Columbus Police Department responded and canvassed the area. During that canvass, home surveillance video footage was obtained. Surveillance footage during the time immediately preceding the robbery shows a silver Ford Taurus with body damage and different tires pass the carrier’s location twice. The carrier stated that the car passed him and turned around in the intersection before the robbery. The Taurus in the video has body damage on the passenger side rear door. The Taurus also has a smaller tire on the front driver’s side than the rear driver’s side with a rim that appears different. The Taurus in the recovered surveillance video also has dark tinted windows as shown below.



9. On or about January 19, 2022, USPIS located a 2012 Ford Taurus registered to Elyzabeth Renee Johnson. A search of law enforcement databases showed that the car was often located at 3353 Urban Hollow Ct., Urbancrest, Ohio (within the Southern District of Ohio).
10. On or about January 20, 2022, U.S. Postal Inspectors located the **SUBJECT VEHICLE** parked in the parking lot of 3353 Urban Hollow Ct., Urbancrest, Ohio. Inspectors photographed the vehicle and determined that it had a larger tire with a different style rim on the driver's side rear as shown in the photo below. The **SUBJECT VEHICLE** also had dark tinted windows on the vehicle as shown in the photo below. Research revealed that the rim that is on the **SUBJECT VEHICLE** is a 19" inch rim that was offered on 2013 and newer models. The **SUBJECT VEHICLE** is a 2012.



11. Investigation into Elyzabeth Renee Johnson, the owner of the **SUBJECT VEHICLE**, revealed that she has an Instagram account under the name "LzReneee." Further investigation showed that this account was listed as a contact in an iPhone belonging to Brandon J. Campbell. Campbell has been indicted and arrested in Southern District of Ohio Case No. 2:21-CR-245 for two armed robberies of postal carriers on September 8, 2021, and September 16, 2021, respectively. During both of those armed robberies, Campbell robbed the respective letter carriers of their arrow keys. During both of those robberies, Campbell was accompanied by a black male accomplice who has not yet been located, charged, or arrested in connection with his role in those offenses.
12. Your affiant knows that suspects steal postal keys to obtain access to mailboxes to further bank fraud and mail theft conspiracies. Your affiant has a mail theft complaint where a stolen check was deposited into a Huntington National Bank account belonging to Asia McCall from August 25, 2021. According to law enforcement databases, McCall resides at the same apartment building where the **SUBJECT VEHICLE** was located.
13. Based upon my prior law enforcement training and experience, it is my considered opinion that conspirators, both known and unknown to investigators, will likely continue to use the **SUBJECT VEHICLE**. Allowing law enforcement officials to track the movements of the **SUBJECT VEHICLE** will assist in the gathering of relevant information and evidence concerning this criminal organization's whereabouts and illegal activities.
14. Based on information obtained from surveillance, I know that the **SUBJECT VEHICLE** is presently within the Southern District of Ohio.

Deployment of the Subject Device

15. To track the movement of the **SUBJECT VEHICLE** effectively and to decrease the chance of detection, I seek authorization to place a tracking device on the **SUBJECT VEHICLE** while it is in the Southern District of Ohio. Because the owner or driver may sometimes park the **SUBJECT VEHICLE** in driveways and on other private property, it may be necessary to enter onto private property and/or move the **SUBJECT VEHICLE** to install, repair, replace, and remove the tracking device.
16. To ensure the safety of the executing officer(s) and to avoid premature disclosure of the investigation, I request that the Court authorize installation, maintenance, and removal of the tracking device during both daytime and nighttime hours. I further request that law enforcement and assisting technical personnel be authorized to temporarily seize and/or enter the **SUBJECT VEHICLE** surreptitiously, covertly, and by any means necessary, for the purpose of surveying, installing, maintaining, and removing such surveillance equipment deemed necessary by law enforcement to assist the physical surveillance of the **SUBJECT VEHICLE**. I also seek permission to enter onto private property to effect said installation and to monitor the signals from that tracking device for a period of 45 days from the date of the Court's order, including signals produced from inside private garages and other locations not open to the public or visual surveillance, and signals produced in the event the subject vehicle leaves the Southern District of Ohio but remains within the United States.

17. Based on the foregoing, I request that the Court issue the proposed search warrant, pursuant to Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 3117, that authorizes members of USPIS or their authorized representatives, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, to install a tracking device in or on the **SUBJECT VEHICLE** within the Southern District of Ohio within 10 days of the issuance of the proposed warrant, to maintain, repair, and/or replace the tracking device as necessary, and to remove the tracking device from the **SUBJECT VEHICLE** after the use of the tracking device has ended; to install, maintain, and remove the tracking device during both daytime and nighttime hours; to surreptitiously enter and/or move the **Subject Vehicle** to effect the installation, repair, replacement, and removal of the tracking device; and to monitor the tracking device for a period of 45 days following the issuance of the warrant, including when the tracking device is inside private garages and other locations not open to the public or visual surveillance, both within and outside the Southern District of Ohio.
18. In accordance with 18 U.S.C. § 3103a(b) and Federal Rule of Criminal Procedure 41(f)(3), I further request that the warrant delay notification of the execution of the warrant for 30 days after the end of the authorized period of tracking (including any extensions thereof) because there is reasonable cause to believe that providing immediate notification may have an adverse result, as defined in 18 U.S.C. § 2705. Providing immediate notice would seriously jeopardize the ongoing investigation by prematurely revealing its existence and giving suspects an opportunity to flee from prosecution, destroy or tamper with evidence, intimidate potential witnesses, notify confederates, and change patterns of behavior.
19. I further request that the Court seal the warrant and the affidavit and application in support thereof, except that copies of the warrant may be maintained by the U.S. Attorney's Office and may be served on Special Agents and other investigative and law enforcement officers of the USPIS, federally deputized state and local law enforcement officers, and other government and contract personnel acting under the supervision of such investigative or law enforcement officers, as necessary to effectuate the warrant. These documents pertain to and discuss an ongoing criminal investigation that is neither public nor known to all the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize the investigation. Sealing these documents will also better ensure the safety of agents and others.
20. Within 10 days of the issuance of the requested warrant, investigators intend to utilize the services of an undercover law enforcement officer to install the GPS device on the exterior of **SUBJECT VEHICLE** while it is present in the Southern District of Ohio. Once this device is installed, it will provide current GPS data as to its present location and whereabouts. Based upon my prior law enforcement training and experience and knowledge of this case, it is believed that known and unknown individual(s) will continue to use the **SUBJECT VEHICLE** with the GPS device installed to further on-going robbery and financial crimes impacting the Columbus, Ohio area.

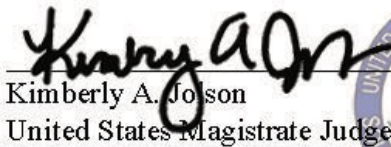
Conclusion

21. Based upon my training and experience and knowledge of this case, there is probable cause to believe that violations of 18 U.S.C. §§ 2114(a) and 1704 have been committed, are presently being committed, and will likely continue to be committed by those involved in a criminal organization within the Southern District of Ohio. There is also probable cause to believe that the use of the GPS device on the **SUBJECT VEHICLE** will provide or lead to the discovery of relevant evidence of violations of the subject offenses. In addition, the tracking of the **SUBJECT VEHICLE** will assist law enforcement officials in identifying the existence and whereabouts of possible co-conspirators connected to robberies and other financial crimes.



Mark Massaro
United States Postal Inspector

Subscribed and sworn to before me this 28th day of January, 2022.



Kimberly A. Johnson
United States Magistrate Judge

